

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAPHAEL AGBUNE,
LINDA LOVING,


Defendants.


COUNT ONE

The Grand Jury charges:

From in or about March 2005, through in or about January 2006, in the Southern District of New York and elsewhere, RAPHAEL AGBUNE and LINDA LOVING, the defendants, unlawfully, willfully and knowingly, did embezzle, steal, purloin, and convert to their own use, money and things of value of the United States and a department and agency thereof, to wit, the United States Department of Housing and Urban Development, and did receive, conceal, and retain the same with intent to convert it to their own use and gain, knowing it to have been embezzled, stolen, purloined and converted, the value of which exceeded \$1,000, to wit, AGBUNE, an employee with New York City Department of Homeless Services, and LOVING, a real estate broker, embezzled and attempted to embezzle approximately \$25,750.00 in Housing Stability Plus subsidies, by falsely claiming that LOVING acted as a broker at certain real estate transactions.

(Title 18, United States Code, Sections 641 and 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

07 CRIM. 395

07 Cr.

MAY 08 2007

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Defendants.

INDICTMENT

07 Cr.

(18 U.S.C. §§ 641 and 2)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

HR 5/8/07

Filed indictment. Case assigned to Crotty, J. A/w issued
for defendants Loving and Agbune

— Francis, J.